

# **EXHIBIT**

# **C**

**By Certified Mail**  
East Greenfield Investors, LLC  
c/o Larry Fromelius  
12228 New Avenue, Building B  
Lemont, IL 60439

**By Email and  
Certified Mail, Return Receipt Requested**  
East Greenfield Investors, LLC  
5611 Walnut Avenue  
Downers Grove, IL 60516  
[l.fromelius@comcast.net](mailto:l.fromelius@comcast.net)  
[jenn.meier@comcast.net](mailto:jenn.meier@comcast.net)

**By Certified Mail, Return Receipt Requested**  
Ronald J. Senechalle  
Brent Amato  
2300 Barrington Road, Suite 220  
Hoffman Estates, IL 60169-2034

**By Certified Mail, Return Receipt Requested**  
Larry Fromelius  
1207 Lisle Place  
Lisle, IL 605320000

#### **NOTICE OF EXPENDITURE FROM ESCROW ACCOUNT #1154688**

Acting pursuant to Section 3 of that certain Escrow Agreement dated as of August 31, 2006 by and among East Greenfield LLC, an Illinois limited liability company ("East Greenfield"), Cliffs Mining Company, a Delaware corporation ("Cliffs") and Chicago Title Insurance Company, a Missouri corporation acting as escrow agent (the "Escrow Agent"), as amended in the EGI/Cliffs Settlement Agreement dated as of August 31, 2017, Cliffs Mining Company is hereby providing prompt notice to East Greenfield that it has initiated a request for expenditure from the above referenced escrow account. The requested amount is for all funds remaining in escrow and the payment is directed to Wisconsin Gas LLC, as a provider of services "performing remedial activities required or otherwise approved or authorized by EPA in payment for the performance of such services."

After its acquisition of the property which is the subject of the "Administrative Order on Consent for a Remedial Investigation /Feasibility Study," CERCLA Docket No. V-W-07-C-861 ("RI/FS AOC"), Wisconsin Gas LLC (d/b/a We Energies) performed further remediation on the property under new obligations imposed upon it by EPA pertaining to the Uplands Portion of the Milwaukee Solvay Coke & Gas Site (the "Site"); such additional remediation was performed pursuant to an Order captioned, "Administrative Settlement Agreement and Order on Consent for Site Fencing/Security, Engineering Evaluation/Cost Analysis and Non-Time Critical Removal Action at the Uplands," CERCLA Docket No. V-W-17-C-0 10 ("EE/CA AOC"). Wisconsin Gas expended in excess of \$30,000,000.00 on remedial action as ordered by EPA pursuant to the EE/CA AOC.

After asserting a demand against Cliffs, Wisconsin Gas and Cliffs engaged in an extensive mediation before Honorable Michael P. Mahoney (Retired, formerly Judge, USDC ND Illinois, Western Div.). The mediation resulted in the attached Settlement Agreement, under which Cliffs must pay Wisconsin Gas for its performance of remedial activities required or otherwise approved or authorized by EPA, i.e., in payment for Wisconsin Gas's performance of the EE/CA AOC. Specifically, Cliffs will pay to Wisconsin Gas an amount in excess of \$3,500,000,

representing Cliffs' share of the remediation by Wisconsin Gas. As such, to fulfill Cliffs' payment to Wisconsin Gas as a provider of services contemplated by the Escrow Agreement, the entirety of the escrow balance is required, in addition to additional funding to be provided by Cliffs.

Considering this notice, we trust East Greenfield has no objection to Cliff's direction of expenditure to the Escrow Agent, a copy of such direction is attached.

If further communication is made, please correspond to the notice recipients under the Escrow Agreement:

Robert Beranek  
Cliffs Mining Company  
c/o Cleveland-Cliffs Headquarters  
200 Public Square, Suite 3300  
Cleveland, OH 44114-2315  
[Rob.Beranek@clevelandcliffs.com](mailto:Rob.Beranek@clevelandcliffs.com)

Joseph E. Tierney, III  
Meissner Tierney Fisher & Nichols S.C.  
111 East Kilbourn Avenue, 19th Floor  
Milwaukee, WI 53202 [jet@mtfn.com](mailto:jet@mtfn.com)

With copy to:  
Andrew Perellis  
Perellis & Associates, LLC  
2549 Waukegan Road, PMB 10034  
Bannockburn, Illinois 60015  
[aperellis@perellislaw.com](mailto:aperellis@perellislaw.com)

**Cliffs Mining Company**

By: Rob Beranek  
Its: Director - Environmental

Dated: May 10, 2021

cc: Chicago Title Insurance Company  
20900 Swenson Drive, Suite 900  
Waukesha, WI 53186  
Attn: Deborah Halmo  
Escrow Account # 1154688

To: Chicago Title Insurance Company  
20900 Swenson Drive, Suite 900  
Waukesha, WI 53186  
Attn: Deborah Halmo

**Re: Chicago Title Insurance Company,  
Escrow Account # 1154688**

**Request for Expenditure**

Acting pursuant to Section 3 of that certain Escrow Agreement dated as of August 31, 2006 by and among East Greenfield LLC, an Illinois limited liability company ("East Greenfield"), Cliffs Mining Company, a Delaware corporation ("Cliffs") and Chicago Title Insurance Company, a Missouri corporation acting as escrow agent (the "Escrow Agent"), as amended in the EGI/Cliffs Settlement Agreement dated as of August 31, 2017, Cliffs Mining Company hereby initiates this request for an expenditure from the escrow account in the amount of **all remaining funds** to be wired in accordance with the following instructions:

Bank ABA Number: # 075 000 022  
Bank Name: U.S. Bank, N.A.  
Bank Address: 777 East Wisconsin Avenue, Milwaukee, WI 53202  
For credit to: Wisconsin Gas LLC  
Account Number: 111-000-847

Date: May 10, 2021.

Cliffs Mining Company

By: Bob Sennert  
Its: Director - Environmental

cc. East Greenfield Investors, LLC  
c/o Larry Fromelius  
12228 New Avenue, Building B  
Lemont, IL 60439

East Greenfield Investors, LLC  
5611 Walnut Avenue  
Downers Grove, IL 60516  
[l.fromelius@comcast.net](mailto:l.fromelius@comcast.net)  
[jenn.meier@comcast.net](mailto:jenn.meier@comcast.net)

With Copy to:  
Ronald J. Senechalle  
Brent Amato  
2300 Barrington Road, Suite 220  
Hoffman Estates, IL 60195

Joseph E. Tierney  
Meissner Tierney Fisher & Nichols S.C.  
111 E. Kilbourn Ave., 19th Floor  
Milwaukee, WI 53202



**9314 8699 0430 0082 3473 18**

RETURN RECEIPT (ELECTRONIC)



Total Postage: \$6.75

EAST GREENFIELD INVESTORS, LLC  
5611 WALNUT AVE  
DOWNERS GROVE, IL 60516-1003

Reference Number: 5984.0000